

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Nathan Connolly and Shani Mott,

Plaintiffs,

v.

Shane Lanham, 20/20 Valuations, LLC, and
loanDepot.com, LLC,

Defendants.

Civil Action No. 1:22-cv-02048-SAG

JOINT MOTION FOR AN AMENDED BRIEFING SCHEDULE

Plaintiffs Nathan Connolly and Shani Mott (“Plaintiffs”) and Defendants Shane Lanham, 20/20 Valuations, LLC, and loanDepot.com, LLC, (“Defendants”) (collectively, “Parties”) hereby jointly move for an order setting a briefing schedule for responding to the Answer to Amended Complaint and Counterclaim filed by Defendants Lanham and 20/20 Valuations and modifying the existing briefing schedule to align with the newly set deadlines. In support of this motion, the Parties respectfully state as follows:

1. On August 15, 2022, Plaintiffs filed a complaint asserting violations of the Fair Housing Act, 42 U.S.C. § 3601 et seq.; the Equal Credit Opportunity Act, 15 U.S.C. § 1961 et seq.; the Civil Rights Act of 1866, 42 U.S.C. §§ 1981, 1982; and Maryland Fair Housing Laws, Md. Code, State Gov’t § 20-702 et seq. ECF 1.

2. On October 28, 2022, Plaintiffs filed an amended complaint, alleging the same violations of law. ECF 25.

3. On November 7, 2022, the Parties filed a Joint Motion to Extend Time to Respond to First Amended Complaint and for a Briefing Schedule for Motions to Dismiss, which was granted. ECF 27, 28.

4. On December 12, 2022, Defendants Lanham and 20/20 Valuations filed a motion to dismiss, ECF 31, and Defendant loanDepot.com filed a separate motion to dismiss, ECF 32.

5. On December 29, 2022, Plaintiffs and Defendants jointly filed a motion for extension of time to file responses and replies, ECF 34, based on numerous exigent circumstances. The Court granted the Parties' motion. ECF 35. Per the Court's order, Plaintiffs' oppositions are currently due on February 10, 2023, and Defendants' replies are currently due on March 17, 2023. *Id.*

6. On January 24, 2023, Defendants Lanham and 20/20 Valuations filed an answer to Plaintiffs' amended complaint and counterclaims against Plaintiffs. ECF 36.

7. This new filing creates a new set of filing deadlines and the Parties therefore request that the Court align the briefing schedules for (1) the oppositions and replies to Defendants' motions to dismiss Plaintiffs' amended complaint and (2) Plaintiffs' response to Defendant Lanham's new counterclaims and oppositions and replies thereto. Specifically, the parties ask that the Court streamline the filing schedule by setting:

- a deadline of March 9, 2023, for Plaintiffs to oppose Defendants' motions to dismiss *and* file any motion or response to Defendants Lanham and 20/20 Valuations's new counterclaims;
- a second deadline of April 21, 2023, for Defendants to submit their replies to Plaintiffs' oppositions to their motions to dismiss *and* for Defendants Lanham and 20/20 Valuations to submit their opposition to any motion by Plaintiffs to dismiss the counterclaims;
- and a third deadline of May 19, 2023, for Plaintiffs to file a reply to Defendants Lanham and 20/20 Valuations's opposition to their motion to dismiss the counterclaims.

8. This will promote efficiency by allowing the Parties to address related issues at the same time while providing adequate time to complete these numerous submissions. In addition, the Parties have other deadlines that conflict with the current deadlines, and unforeseen family health

issues have affected one of Plaintiffs' attorneys. Accordingly, the Parties respectfully request an amended schedule as set forth below.

THEREFORE, the Parties respectfully request that the Court set the following deadlines:

- a) Plaintiffs' oppositions to Defendants' motions to dismiss and any motion to dismiss Defendant Lanham and 20/20 Valuations's counterclaims are due on March 9, 2023;
- b) Defendants' replies to Plaintiffs' opposition to Defendants' motions to dismiss and any opposition to Plaintiffs' motion to dismiss Defendant Lanham and 20/20 Valuations's counterclaims are due on April 21, 2023; and
- c) Plaintiffs' reply to Defendants' oppositions to Plaintiffs' motion to dismiss Defendant Lanham and 20/20 Valuations's counterclaims are due on May 19, 2023.

Dated: January 30, 2023

Respectfully Submitted,

/s/ John Relman

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of January, 2023, a copy of the foregoing Joint Motion For an Amended Briefing Schedule was filed using the CM/ECF system for the District of Maryland which will send notice to all counsel of record.

/s/ John Relman
John Relman

Attorney for Plaintiffs